

LOCAL BANKRUPTCY FORM 5071-1

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

In Re: : Bankruptcy Case No. 1:20-bk-03513-HWV  
:  
EUGENE CHARLES CONRAD, JR. : Chapter 13  
a/k/a EUGENE C. CONRAD :  
a/k/a CHIP CONRAD : **Nature of Proceeding:**  
and CRYSTAL M. CONRAD : **Motion for Relief from Automatic Stay**  
f/k/a CRYSTAL M. RILEY, :  
:  
Debtors :  
----- :  
ALLY BANK, :  
Movant :  
v. :  
:  
EUGENE CHARLES CONRAD, JR. :  
a/k/a EUGENE C. CONRAD :  
a/k/a CHIP CONRAD :  
and CRYSTAL M. CONRAD :  
f/k/a CRYSTAL M. RILEY, :  
:  
Respondents

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance.

Awaiting response from Movant to settlement offer by Respondent.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: August 23, 2021

/s/ Jason Brett Schwartz  
Attorney for Movant  
Jason Brett Schwartz, Esquire  
I.D. No.: 92009  
(267) 909-9036

- \_ No alterations or interlineations of this document are permitted
- \_ If this is not a first request for continuance, then a Motion for Continuance must be filed.